IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

Douglas Mastriano : CIVIL NO. 5:24-cv-00567-F

Plaintiff,

:

V.

James Gregory, III, et al

:

Defendants. :

CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND

BEFORE THE HONORABLE STEPHEN P. FRIOT, UNITED STATES DISTRICT JUDGE.

The Plaintiff, by and through his undersigned attorneys, hereby submits his consent motion to respond in opposition to the Roland Kuhn Motion to Dismiss (ECF 105), with the consent of Matthew J. Lund, Esq., Troutman Pepper, attorneys for defendant Roland Kuhn, and says in support thereof:

- 1. The undersigned has consented to the certain defendants filing his motion with an initial extension of time, which they did and which now has a response date of November 6, 2024.
- 2. The undersigned has been diligently working and recently has finished a lengthy trial in another federal case and has considerable additional scheduling matters on his calendar unanticipated in the first extension, including an oral argument in the Maryland Appellate Court on Nov. 1.

- 3. A short extension of time to December 6, 2024 is requested to respond to the defendant's motion and his attorney, Matthew Lund, has stated consent is provided for the same.
- 4. No prejudice to any party will occur as dates for response to the complaint for other defendants have also been extended and additional briefing and responsive briefing to other motions in this matter are not presently due until late December.

WHEREFORE the Plaintiff requests the Court GRANT his consent request for an extension of time until December 6, 2024 to respond to the Kuhn motion.

Respectfully submitted, The Cox Law Center, LLC

By: _____//s//_
Daniel L. Cox, Ok. Fed. Bar No. 2490
Attorney for Plaintiff
The Cox Law Center, LLC
P.O. Box 545
Emmitsburg, MD 21727

Ph: 410-254-7000 Fx: 410-254-7220

E-mail: dcox@coxlawcenter.com

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was served on counsel of record via CM/ECF.

/	/ _S /
Daniel L. Cox	